

Attorney for Plaintiff,
Gerardo Hernandez

GERARDO HERNDANDEZ,

VS.

Defendants.

**STIPULATION FOR DISMISSAL OF
ACTION; ~~PROPOSED~~ ORDER**

1 **IT IS HEREBY STIPULATED** by and between Plaintiff Gerardo Hernandez
2 (“Plaintiff”) and Defendants Spring Charter Inc. dba Valley Market & Gas; and Satnam LLC
3 (collectively “Defendants”), by and through their respective counsel, that pursuant to Federal
4 Rule of Civil Procedure 41(a)(2), this action be dismissed with prejudice.

5 **IT IS FURTHER STIPULATED** by the Parties that the Court shall expressly retain
6 jurisdiction over this matter for the purpose of adjudicating any subsequent motion Plaintiff
7 may bring to recover his attorneys’ fees and costs (“Fees Motion”). Any Fees Motion shall be
8 filed within 45 days of the date the Court issues its Order on this stipulation.

9
10 Dated: November 13, 2019

MOORE LAW FIRM, P.C.

11 /s/ Tanya E. Moore

12 Tanya E. Moore
13 Attorney for Plaintiff,
Gerardo Hernandez

14
15 Dated: November 13, 2019

KATZOFF & RIGGS LLP

16 /s/ Stephen G. Preonas

17 Stephen G. Preonas
18 Attorneys for Defendants,
Spring Charter Inc. dba Valley Market & Gas;
and Satnam LLC

19
20 **ATTESTATION**

21 Concurrence in the filing of this document has been obtained from each of the individual(s)
22 whose electronic signature is attributed above.

23 /s/ Tanya E. Moore

24 Tanya E. Moore
25 Attorney for Plaintiff,
Gerardo Hernandez

ORDER

The parties having so stipulated,

IT IS HEREBY ORDERED as follows:

1. Plaintiff Gerardo Hernandez (“Plaintiff”) and Defendants Spring Charter Inc. dba Valley Market & Gas; and Satnam LLC (collectively “Defendants”) shall comply with the terms of the Settlement Agreement and Limited Release, the terms of which are incorporated herein by reference.

2. By consent of Plaintiff and Defendants, the Court shall retain jurisdiction in this matter for the purpose of adjudicating any motion by Plaintiff to recover his attorneys’ fees and costs (“Fees Motion”).

3. Plaintiff shall file any Fees Motion within 45 days of the date of this Order.

4. Except as provided for in paragraphs 1 and 2 above, this action is dismissed with prejudice.

IT IS SO ORDERED.

Dated: December 11, 2019


United States Magistrate Judge